The Honorable James L. Robart 1 | 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE 8 WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 11 Maria Mora-Villalpando, CASE NO. C18-655-JLR 12 Plaintiff, 13 JOINT STATUS REPORT 14 v. 15 U.S. Immigration and Customs Enforcement and U.S. Customs and Border Protection, 16 and U.S. Citizenship and Immigration 17 Services. 18 Defendants. 19 20 The parties hereby file this Joint Status Report as required by the Court's Order on the 21 parties' previous joint status report (Dkt. #68). 22 The parties agree that the merits of the case have now been resolved. The only remaining 23 24 issues are whether attorney's fees are warranted and, if so, the amount. The parties are striving to 25 negotiate and resolve that issue without the Court's intervention. If they are able to do so, the parties 26 will file a stipulated motion to dismiss. 27 28

To that end, plaintiff's counsel submitted a fee request and documentation to defense counsel 1 | 2 on February 8, 2021. Defendants are in the process of evaluating that request. 3 The parties propose that within 60 days of the date the Court files an order on this joint status 4 report, the parties will file another joint status report, a motion to dismiss, or a proposed briefing 5 schedule for Plaintiff's Motion for Attorney's Fees. 6 7 Dated this 15th day of March, 2021. 8 <u>/s/ Khaled Al</u>rabe Khaled Alrabe, NY Bar Reg. 5542311 9 (admitted *pro hace vice*) 10 National Immigration Project of the National Lawyers Guild 11 89 South St. Suite 603 12 Boston, MA 02111 (617) 412-6794 Ph. 13 khaled@nipnlg.org Em. 14 /s/ Devin T. Theriot-Orr 15 Devin T. Theriot-Orr, WSBA #33995 OPEN SKY LAW, PLLC 16 20415 72nd Ave. S., Ste. 110 Kent, WA 98032 17 Ph. (206) 962-5052 18 Fax (206) 681-9663 devin@opensky.law Em. 19 20 TESSA M. GORMAN 21 Acting United States Attorney 22 s/ Brian C. Kipnis BRIAN C. KIPNIS, CA SBA #105161 23 24 s/ Sarah K. Morehead SARAH K. MOREHEAD, WSBA #29680 25 **Assistant United States Attorneys** Office of the United States Attorney 26 Suite 5220, United States Courthouse 27 700 Stewart Street Seattle, Washington 98101-1271 28

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